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# **EXHIBIT B**

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### Search Terms for Email and Workplace Chat

Search Term	Total Documents Hit By Term	Total Documents Hit by Term Including Families
Scarcii iciiii	Total Bocaments The By Term	rannes
[For Aurelien Rodriguez and Hugo Touvron] (pre-train* OR		
pretrain* OR dataset* OR "data set*" OR "training data") AND		
(llama OR genesis OR "large language model" OR LLM)	51,000	57,279
((Llama OR Genesis) w/15 "open source") OR ((Llama OR		
Genesis) w/5 (open AND (release OR license)))	7,985	12,050
(Copyright* w/15 compensat*) OR (Copyright* w/15 consent*)		
OR (Copyright* w/15 licens*) OR (copyright* w/15 credit*) OR		
(copyright* w/15 attribut*) OR (author* w/15 compensat*) OR		
(author* w/15 consent*) OR (author* w/15 licens*) OR		
(author* w/15 credit*) OR (author* w/15 attribut*)	4,490	16,667
((Copyright* w/15 compensat*) OR (Copyright* w/15		
consent*) OR (Copyright* w/15 licens*) OR (copyright* w/15		
credit*) OR (copyright* w/15 attribut*) OR (author* w/15		
compensat*) OR (author* w/15 consent*) OR (author* w/15		
licens*) OR (author* w/15 credit*) OR (author* w/15 attribut*))		
AND (LLM OR Llama OR GenAl OR train* OR "large language	4 120	16 260
model") (market* w/25 Llama) OR (market* w/25 Genesis) OR (promo*	4,138	16,269
w/25 Llama) OR (promo* w/25 Genesis)	3,390	7,413
W/23 Ctallia) ON (profile W/23 Genesis)	3,390	7,413
	2,937	9,915
Books3 OR "books 3" OR b3g OR Gutenberg OR		
	2,785	9,307
	1,773	5,735
	1,673	6,065
	1,494	2,348
Books3 OR "books 3" OR b3g OR Gutenberg	1,448	7,381
(go-to-market OR "go to market" OR "executive summary" OR	,	
roadmap OR "road map" OR SWOT) w/20 (Llama OR Genesis)	1,129	2,192

(Schumer w/10 Al) OR (Schumer w/10 Artificial) OR (senat*		
w/10 Al) OR (senat* w/10 Artificial)	834	1,118
(mitigat* w/20 memoriz*) OR (mitigat* w/20 copyright) OR		
(mitigat* w/20 IP) OR (mitigat* w/20 "intellectual property")	788	1,255
[For all ESI custodians other than Aurelien Rodriguez and		
Hugo Touvron] (pre-train* OR pretrain* OR dataset* OR "data		
set*" OR "training data") AND [Header includes:]		
-		
OR shawn@keenagi.com OR		
shawnpresser@gmail.com OR Stella OR Biderman OR		
eleuthero.ai OR Eleuther OR (leo w/3 gao) OR leogao* OR		
microsoft OR microsoft.com OR OpenAl OR openai.com OR		
anthropic OR anthropic.com OR Dell OR dell.com OR		
Cloudflare OR cloudflare.com OR Qualcomm OR		
qualcomm.com OR timdettmers OR Dettmers"	567	908
	456	3,194
(("meta Al" w/5 Facebook) OR ("meta Al" w/5 Instagram) OR		
("meta Al" w/5 Reels) OR ("meta Al" w/5 whatsapp) OR ("meta		
Al" w/5 Threads) OR ("meta Al" w/5 oculus) OR ("meta Al" w/5		
metaverse) OR ("meta Al" w/5 orion) OR ("meta Al" w/5 rayban))		
AND (integrate OR incorporate OR augment OR monetize OR		
monetization)	410	817
(licens* w/3 book*) OR (licens* w/3 textbook*) OR (licens* w/3		
novel*) OR (licens* w/3 literature)	403	2,672
(Software OR tool) w/20 ((Copyright* w/15 compensat*) OR		
(Copyright* w/15 consent*) OR (Copyright* w/15 licens*) OR		
(copyright* w/15 credit*) OR (copyright* w/15 attribut*) OR		
(author* w/15 compensat*) OR (author* w/15 consent*) OR		
(author* w/15 licens*) OR (author* w/15 credit*) OR (author*		
w/15 attribut*))	346	1,120
(litigation OR lawsuit OR "fair use") w/20 (Kadrey OR Silverman	5.0	
OR Golden OR Woodson OR Greer OR Snyder OR Hwang OR		
Coates OR Lippman OR Klam OR Diaz OR Díaz OR Terkeurst OR		
Farnsworth)	318	495
i dilionordij	510	490

(licens* w/3 books) OR (licens* w/3 textbooks) OR (licens* w/3		
novels) OR (licens* w/3 literature)	300	2,460
((Compet* w/5 analys*) OR (Compet* w/5 assess*)) AND		
(Llama OR Genesis)	255	729
"publicly available datasets" AND llama	229	1,061
(Llama w/10 budget) OR (Llama w/10 "operational expenses")		
OR (Llama w/10 "gross margin") OR (Llama w/10 "operating		
margin") OR (Llama w/10 profit) OR (Llama w/10 EPS) OR		
(Llama w/10 "earnings per share")	222	486
//Llama w/F Facebook) OR /Llama w/F Instagram) OR /Llama		
((Llama w/5 Facebook) OR (Llama w/5 Instagram) OR (Llama		
w/5 Reels) OR (Llama w/5 whatsapp) OR (Llama w/5 Threads)		
OR (Llama w/5 oculus) OR (Llama w/5 metaverse) OR (Llama		
w/5 orion) OR (Llama w/5 rayban)) AND (integrate OR		
incorporate OR augment OR monetize OR monetization)	139	464
((book* w/20 storytelling) OR (book* w/20 narrative) OR (book*		
w/20 value) OR (book* w/20 benefit)) AND (dataset OR		
"training data")	116	907
	108	171
"Al Insight Forum"	101	126
"theorem proving" AND (dataset OR "training data")	100	522
	97	434
("business plan" OR "marketing plan" OR "growth plan" OR (business* w/3 summar*) OR (market* w/3 summar*) OR		
(grow* w/3 summar*) OR (strateg* w/3 summar*)) w/50 Llama	87	166
((Shawn w/3 Presser) OR shawnpresser) w/50 (pre-train* OR		
pretrain* OR dataset* OR "data set*" OR "training data" OR		
"the pile" OR Llama OR Genesis)	83	616
	73	176

((Richard w/3 Kadrey) OR (Sarah w/3 Silverman) OR (Christopher w/3 Golden) OR (Jacqueline w/3 Woodson) OR (Andrew w/3 Greer) OR (Andrew w/3 Sean)) w/15 (Ilama OR Ilm OR Ilms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies)	70	108
(Contract* w/30 RLHF) OR (Contract* w/30 annotation*) OR (Agreement* w/30 RLHF) OR (Agreement* w/30 annotation*) OR (statement w/30 RLHF) OR (SOW w/30 RLHF) OR (statement w/30 annotation*) OR (SOW w/30 annotation*) OR (SOW w/30 RLHF)	53	69
((Sean w/3 Greer) OR (Rachel w/3 Snyder) OR (David w/3 Hwang) OR (Ta-Nehisi w/3 Coates) OR (Laura w/3 Lippman)) w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books 3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR copy OR copies)	30	74
(christopher w/3 farnsworth) OR "blood oath" OR "president's vampire" OR "red, white, and blood" OR "red, white, & blood" OR "a nathaniel cade story" OR "the burning men" OR "eternal world" OR killfile OR "Deep state: a nathaniel cade story" OR ("deep state" AND farnsworth) OR (flashmob AND farnsworth)	22	2,341
("Meta Al" w/10 budget) OR ("Meta Al" w/10 "operational expenses") OR ("Meta Al" w/10 "gross margin") OR ("Meta Al" w/10 "operating margin") OR ("Meta Al" w/10 profit) OR ("Meta Al" w/10 EPS) OR ("Meta Al" w/10 "earnings per share")	22	35
((Matthew w/3 Klam) OR (Junot w/3 Diaz) OR (Junot w/3 Díaz) OR (Lysa w/3 Terkeurst)) w/15 (llama OR llm OR llms OR "large language model" OR "large language models" OR pre-train OR pre-trains OR pretrained OR pre-training OR dataset OR datasets OR "data set" OR "training data" OR "books 3" OR books 3 OR bg 3 OR "the Pile" OR reproduc* OR memoriz* OR		
copy OR copies)	22	24
(Llama w/15 stock) AND (price OR valuation OR increase OR impact OR decrease)	20	51
("Meta Al" w/15 stock) AND (price OR valuation OR increase OR	20	31
impact OR decrease)	13	20

(llama w/10 license w/10 pric*) OR (llama w/10 license w/10		
fee) OR (llama w/10 license w/10 charge) OR (llama w/10		
license w/10 royalty)	12	25
((metaAl w/5 Facebook) OR (metaAl w/5 Instagram) OR (metaAl		
w/5 Reels) OR (metaAl w/5 whatsapp) OR (metaAl w/5 Threads)		
OR (metaAl w/5 oculus) OR (metaAl w/5 metaverse) OR		
(metaAl w/5 orion) OR (metaAl w/5 rayban)) AND (integrate OR		
incorporate OR augment OR monetize OR monetization)	12	12
(eleuther w/20 books3) OR (eleutherAl w/20 books3)	11	13
(book* w/10 long-range) OR (book* w/10 "context model*")	5	57
eye w/20 books3	5	13
(MetaAl w/10 budget) OR (MetaAl w/10 "operational expenses")		
OR (MetaAl w/10 "gross margin") OR (MetaAl w/10 "operating		
margin") OR (MetaAl w/10 profit) OR ("Met Al" w/10 EPS) OR		
(MetaAl w/10 "earnings per share")	3	25
, , , , , , , , , , , , , , , , , , ,		
("Sandman Slim" OR Bedwetter OR Ararat OR "Aloha from Hell"		
OR "Everything Box" OR "Kill the Dead" OR "Perdition Score" OR		
"Wrong Dead Guy" OR "Dead Ringers") w/15 (llama OR llm OR		
llms OR "large language model" OR "large language models" OR		
pre-train OR pre-trains OR pretrained OR pre-training OR		
dataset OR datasets OR "data set" OR "training data" OR "books		
3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz*		
OR copy OR copies)	1	3
, and the same of		_
("The Best Yes" OR (Unglued w/10 TerKeurst) OR "Unglued:		
Making Wise Choices") w/15 (llama OR llm OR llms OR "large		
language model" OR "large language models" OR pre-train OR		
pre-trains OR pretrained OR pre-training OR dataset OR		
datasets OR "data set" OR "training data" OR "books 3" OR		
books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz* OR		
copy OR copies)	1	,
copy on copies,		_
("After I'm Gone" OR "No Visible Bruises" OR "Brown Girl		
Dreaming" OR "Water Dancer" OR "We Were Eight Years in		
Power" OR "Brief Wondrous Life of Oscar Wao") w/15 (llama OR		
llm OR llms OR "large language model" OR "large language		
models" OR pre-train OR pre-trains OR pretrained OR pre-		
training OR dataset OR datasets OR "data set" OR "training		
data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR		
reproduc* OR memoriz* OR copy OR copies)	0	0
reproduce On memoriz on copy on copies)	l o	<u> </u>

("How it was for me" OR (Less w/10 Greer) OR "Path of Minor		
Planets" OR "Golden Child" OR "Trying to find Chinatown and		
Bondage" OR "Trying to find Chinatown & Bondage") w/15		
(llama OR llm OR llms OR "large language model" OR "large		
language models" OR pre-train OR pre-trains OR pretrained OR		
pre-training OR dataset OR datasets OR "data set" OR "training		
data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR		
reproduc* OR memoriz* OR copy OR copies)	0	0
(IID and an Denote II OD On such line of OD IID and if all Observed all OD		
("Pandora Room" OR Snowblind OR "Beautiful Struggle" OR		
(Drown w/10 Diaz) OR (Drown w/10 Díaz) OR "Confessions of		
Max Tivoli" OR "M. Butterfly" OR "Who is Rich?") w/15 (llama OR		
Ilm OR Ilms OR "large language model" OR "large language		
models" OR pre-train OR pre-trains OR pretrained OR pre-		
training OR dataset OR datasets OR "data set" OR "training		
data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR		
reproduc* OR memoriz* OR copy OR copies)	0	0
("Sam, the cat and other stories" OR "Sam, the cat & other		
stories" OR "In a Strange City" OR "Lady in the Lake") w/15		
(llama OR llm OR llms OR "large language model" OR "large		
language models" OR pre-train OR pre-trains OR pretrained OR		
pre-training OR dataset OR datasets OR "data set" OR "training		
data" OR "books 3" OR books 3 OR bg3 OR "the Pile" OR		
reproduc* OR memoriz* OR copy OR copies)	0	0
((Embraced w/20 TerKeurst) OR (Embraced w/5 Devotions) OR		
"It's Not Supposed to Be this way Study Guide" OR "Uninvited –		
Study Guide" OR "Made to Crave Devotional") w/15 (llama OR		
llm OR llms OR "large language model" OR "large language		
models" OR pre-train OR pre-trains OR pretrained OR pre-		
training OR dataset OR datasets OR "data set" OR "training		
data" OR "books 3" OR books3 OR bg3 OR "the Pile" OR		
reproduc* OR memoriz* OR copy OR copies)	o	0
,		
((Feathers w/10 Woodson) OR "Harbor Me" OR "If You Come		
Softly" OR "Miracle's Boys" OR "Red at the Bone" OR (Uninvited		
w/20 TerKeurst) OR "Capture His Heart") w/15 (llama OR llm OR		
llms OR "large language model" OR "large language models" OR		
pre-train OR pre-trains OR pretrained OR pre-training OR		
dataset OR datasets OR "data set" OR "training data" OR "books		
3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz*		
OR copy OR copies)	0	0

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((Sunburn w/10 Lippman) OR "What the dead know" OR "Wilde		
Lake" OR "After Tupac" OR "Another Brooklyn" OR (Behind w/10		
Woodson) OR "Beneath a Meth Moon") w/15 (llama OR llm OR		
llms OR "large language model" OR "large language models" OR		
pre-train OR pre-trains OR pretrained OR pre-training OR		
dataset OR datasets OR "data set" OR "training data" OR "books		
3" OR books3 OR bg3 OR "the Pile" OR reproduc* OR memoriz*		
OR copy OR copies)	0	0
(MetaAl w/15 stock) AND (price OR valuation OR increase OR		
impact OR decrease)	0	0

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Search Terms for Non-email and Workplace Chat

		Total Documents Hit by Term
Search Term	Total Documents Hit By Term	Including Families
Books3 OR b3g OR Gutenberg OR pre-train OR pre-training OR pre-trains OR pre-trained OR pretrain OR pretrains OR		
pretraining OR pretrained OR dataset OR datasets OR "data		
set" OR "data sets" OR "training data" OR annotation OR		
annotations OR Llama OR Genesis OR LLM OR LLMs OR "large		
language model" OR "large language models" OR Eleuther OR		
EleutherA <b>I</b>	41,495	43,332
(Copyright* w/15 compensat*) OR (Copyright* w/15 consent*)		
OR (Copyright* w/15 licens*) OR (copyright* w/15 credit*) OR		
(copyright* w/15 attribut*) OR (author* w/15 compensat*) OR		
(author* w/15 consent*) OR (author* w/15 licens*) OR		
(author* w/15 credit*) OR (author* w/15 attribut*)	5,172	5,630
	1,836	2,042
(mitigatt/20 mamarist) OR (mitigatt/20 againsidet) OR		
(mitigat* w/20 memoriz*) OR (mitigat* w/20 copyright) OR (mitigat* w/20 IP) OR (mitigat* w/20 "intellectual property")	1,560	1,615
(midgat w/2017) ON (midgat w/20 mieliectdat property )	1,300	1,015
	1,291	1,418
	810	836
	010	555
	747	770
(("meta Al" w/5 Facebook) OR ("meta Al" w/5 Instagram) OR		
("meta Al" w/5 Reels) OR ("meta Al" w/5 whatsapp) OR ("meta		
Al" w/5 Threads) OR ("meta Al" w/5 oculus) OR ("meta Al" w/5		
metaverse) OR ("meta Al" w/5 orion) OR ("meta Al" w/5		
rayban)) AND (integrate OR incorporate OR augment OR		
monetize OR monetization)	527	950
((book* w/20 storytelling) OR (book* w/20 narrative) OR		
(book* w/20 value) OR (book* w/20 benefit)) AND (dataset OR "training data")	442	446
"theorem proving" AND (dataset OR "training data")	421	425
theorem proving AND (dataset On training data )	421	425

(Llama w/10 budget) OR (Llama w/10 "operational expenses")		
OR (Llama w/10 "gross margin") OR (Llama w/10 "operating		
margin") OR (Llama w/10 profit) OR (Llama w/10 EPS) OR		
(Llama w/10 "earnings per share")	413	413
(Ltariia W/10 - Carriings per share )	209	217
	203	21/
((Llama w/5 Facebook) OR (Llama w/5 Instagram) OR (Llama		
w/5 Reels) OR (Llama w/5 whatsapp) OR (Llama w/5 Threads)		
OR (Llama w/5 oculus) OR (Llama w/5 metaverse) OR (Llama		
w/5 orion) OR (Llama w/5 rayban)) AND (integrate OR		
incorporate OR augment OR monetize OR monetization)	208	731
(licens* w/3 books) OR (licens* w/3 textbooks) OR (licens* w/3		
novels) OR (licens* w/3 literature)	194	240
"publicly available datasets" AND llama	189	
(litigation OR lawsuit OR "fair use") w/20 (Kadrey OR Silverman		
OR Golden OR Woodson OR Greer OR Snyder OR Hwang OR		
Coates OR Lippman OR Klam OR Diaz OR Díaz OR Terkeurst OR		
Farnsworth)	99	252
Tamoroniy		
("Meta Al" w/10 budget) OR ("Meta Al" w/10 "operational		
expenses") OR ("Meta Al" w/10 "gross margin") OR ("Meta Al"		
w/10 "operating margin") OR ("Meta Al" w/10 profit) OR ("Meta		
Al" w/10 EPS) OR ("Meta Al" w/10 "earnings per share")	96	96
Al Wilder of On ( Pieta Al Wild earnings per share )	30	]
((metaAl w/5 Facebook) OR (metaAl w/5 Instagram) OR		
(metaAl w/5 Reels) OR (metaAl w/5 whatsapp) OR (metaAl w/5		
Threads) OR (metaAl w/5 oculus) OR (metaAl w/5 metaverse)		
OR (metaAl w/5 orion) OR (metaAl w/5 rayban)) AND (integrate		
OR incorporate OR augment OR monetize OR monetization)	88	90
(Llama w/15 stock) AND (price OR valuation OR increase OR	- 60	] 90
	42	10
impact OR decrease)	43	46
(christopher w/3 farnsworth) OR "blood oath" OR "president's		
vampire" OR "red, white, and blood" OR "red, white, & blood"		
OR "a nathaniel cade story" OR "the burning men" OR "eternal		
world" OR killfile OR "Deep state: a nathaniel cade story" OR	25	25
("deep state" AND farnsworth) OR (flashmob AND farnsworth)	35	35
(MetaAl w/10 budget) OR (MetaAl w/10 "operational		
expenses") OR (MetaAl w/10 "gross margin") OR (MetaAl w/10		
"operating margin") OR (MetaAl w/10 profit) OR ("Met Al" w/10		
EPS) OR (MetaAl w/10 "earnings per share")	30	40
El O/ On (Pictani W/ 10 callings per share )	30	40
(book* w/10 long-range) OR (book* w/10 "context model*")	22	22
("Meta AI" w/15 stock) AND (price OR valuation OR increase OR		
impact OR decrease)	16	16
(eleuther w/20 books3) OR (eleutherAl w/20 books3)	12	
(Ciculia W/20 DOOK30) Off (Ciculia M) W/20 DOOK30)	12	l 12

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(llama w/10 license w/10 pric*) OR (llama w/10 license w/10		
fee) OR (llama w/10 license w/10 charge) OR (llama w/10		
license w/10 royalty)	11	142
(MetaAl w/15 stock) AND (price OR valuation OR increase OR		
impact OR decrease)	8	8
eye w/20 books3	0	0

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Search Terms for Mark Zuckerberg (WhatsApp)

Search Term	Total Documents Hit By Term	Total Documents Hit by Term Including Families
Llama	599	599
Books	112	112
Textbooks	3	3
Books3	0	0
B3g	0	0
	0	0
	0	0
Publisher*	29	29
Licens*	195	195
Copyright	13	13
IP	43	43

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Search Terms for Mark Zuckerberg (SMS and MMS)

Se	earch Term	Total Documents Hit By Term	Total Documents Hit by Term Including Families
Llama		0	0
Books		3	3
Textbooks		0	0
Books3		0	0
B3g		0	0
		0	0
		0	0
Publisher*		0	0
Licens*		0	0
Copyright		0	0
<b>I</b> P		4	4

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### Search Terms for Joelle Pineau (WhatsApp)

Search Term	Total Documents Hit By Term	Total Documents Hit by Term Including Families
Llama	62	83
Books	1	2
Textbooks	0	0
Books3	0	0
B3g	0	0
	0	0
	0	0
Publisher*	0	0
Licens*	15	21
Copyright	0	0
IP .	2	4

### Case 3:23-cv-03417-VC Document 321-2 Filed 12/09/24 Page 15 of 15

### Search Terms for Ahmad Al-Dahle (WhatsApp)

Search Term	Total Documents Hit By Term	Total Documents Hit by Term Including Families
Llama	227	227
Books	15	15
Textbooks	0	0
Books3	0	0
B3g	0	0
	0	0
	0	0
Publisher*	1	1
Licens*	54	54
Copyright	3	3
IP	12	12